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once having acquired jurisdiction for any purpose, equity may proceed and give complete relief; and accordingly, where a plaintiff establishes his right to a permanent injunction, he may also have damages for past injury. *Keppel v. Lehigh Coal, etc. Co.*, 200 Pa. 649, 50 Atl. 302. See 1 AMES, CASES, EQUITY, 571, note; 1 POMEROY, EQ. JUR., 4 ed., § 237. If damages had been the only remedy sought by the several plaintiffs, the jurisdiction of equity having been invoked solely to avoid a multiplicity of suits, it could be said, with some show of reason, that there was a misjoinder of causes of action, — that each action should be tried separately at law. *Ducktown Sulphur, etc. Co. v. Fain*, 109 Tenn. 56, 70 S. W. 813; *Tribette v. Ill. Cent. R. Co.*, 70 Miss. 182, 12 So. 32; *Roanoke Guano Co. v. Saunders*, 173 Ala. 347, 56 So. 198. But *cf. Guess v. Stone, etc. Ry. Co.*, 67 Ga. 215. But where several plaintiffs are permitted to join in a bill for an injunction, there seems to be no reason why equity should not award separate damages to each, as was done in the principal case. However, owing to the former hostility of the common-law courts, equity has, in such a situation, been reluctant to give the characteristically legal remedy of money damages even by way of complete relief. *Murray v. Hay, supra*; *City of Paducah v. Allen*, 49 S. W. (Ky.) 343. See *Grant v. Schmidt*, 22 Minn. 1, 3. The tendency represented by the principal case is a wholesome one.

HOMICIDE — INTENT — INTENT TO KILL NOT COINCIDENT WITH KILLING. — The accused struck his wife with a plowshare. Under a reasonable belief that she was dead, the accused then hung her to a beam, so that it might be thought she had committed suicide. In fact, it was the hanging and not the blow that caused death. *Held*, that the accused is not guilty of murder under the Indian Penal Code. *In re Palani Goundan*, 26 Madras L. T. R. 68.

At common law it is clear that the hanging, of itself, would not make the accused guilty of murder because of the lack of a guilty mind, since the intent of an accused must depend on the facts as he reasonably conceived them. *Shorter v. People*, 2 Comst. (N. Y.) 193; *Reg. v. Rose*, 15 Cox. c. c. 540. And obviously the blow with the plowshare, of itself, would not make him guilty even of manslaughter, because it did not kill. But the hanging having been done to conceal the effects of the blow, the two may be regarded as so bound together that whatever intent the accused had at the time he struck the blow may be attributed to him at the time of the hanging. *Cf. Jackson v. Commonwealth*, 100 Ky. 239, 38 S. W. 422, 1091. Similarly, in other parts of the criminal law it is held that the intent outlives the technical completion of the offense. On such reasoning, if A and B commit a burglary in common, and during their escape A kills a man, B is guilty of murder. *Starks v. State*, 137 Ala. 9, 34 So. 687. Under this view of the principal case the defendant would, at common law, be guilty of either murder or manslaughter, according to the nature of the original assault. *Jackson v. Commonwealth*, 100 Ky. 239, 38 S. W. 422, 1091. But this theory is not wholly satisfactory, because it operates as a conclusive presumption that at the time of his second act the accused had a certain mental state, which it is quite possible he did not have in fact. It is suggested that the difficulty could be overcome by regarding the blow as the proximate cause of death, either on the ground that it directly caused the hanging, or that the hanging was done in an attempt to lessen the danger (to himself) caused by the blow. Both these theories are equally applicable under the Indian Code. See INDIAN PENAL CODE, § 299.

ILLEGAL CONTRACTS — CONTRACT AGAINST PUBLIC POLICY — MEMBER OF LEGISLATURE ACTING AS LAND AGENT BETWEEN VENDOR AND GOVERNMENT. — The defendant employed the plaintiff's agent, A, who was a member of the legislative assembly, to sell the defendant's land to the government. The legislative assembly had the power to advise the board and minister charged